

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	
	§	CASE NO. 25-40712
DZS INC.,¹	§	
	§	(Chapter 7)
DEBTOR.	§	

**TRUSTEE’S EMERGENCY MOTION TO SCHEDULE EMERGENCY
HEARING WITH RESPECT TO VARIOUS INITIAL MOTIONS**

COMES NOW, Michelle H. Chow, Michelle H. Chow, Chapter 7 Trustee of the above-referenced cases, by and through her proposed counsel Singer & Levick, P.C, and files *Trustee’s Emergency Motion to Schedule Emergency Hearing With Respect to Various Initial Motions* (“**Motion**”) and, in support of same, would respectfully show the Court as follows:

1. On March 14, 2025 (“**Petition Date**”), DZS Inc. (“**Debtor DZS**”), DZS Services Inc. (“**Debtor DZS Services**”) and DZS California Inc. (“**Debtor DZS California**”) (together “**Debtor**”) each filed a Voluntary Petition under Chapter 7 of Title 11 of the UNITED STATES CODE (“**Bankruptcy Code**”) commencing the above-captioned cases (“**Bankruptcy Cases**”).

2. Michelle H. Chow is the duly appointed Chapter 7 Trustee (“**Trustee**”) for each of the Estates of DZS Inc., DZS Services Inc. and DZS California Inc.

3. Prior to the Petition Date, Debtor was a large publicly traded telecom business which developed hardware and software systems enabling broadband usage. This is not a typical Chapter 7 case and the assets are much more complex than a typical Chapter 7 case. There are in excess of 3500 names on the creditors matrix for each case.

¹ The Debtors in these Chapter 7 cases, along with the last four digits of each Debtor’s Federal Tax Identification Number, include: DZS Inc. (9099), DZS Services Inc. (3763) and DZS California Inc. (3221). The location of the Debtors’ service address is: 5700 Tennyson Parkway, Suite 400, Plano, TX 75024.

4. Contemporaneously with the filing of this Motion, the Trustee has filed an *Expedited Motion to Reject Lease (203 Redwood Shores Parkway, Suite 100, Redwood City, CA)* (“**Rejection Motion**”), an *Expedited Motion for Joint Administration* (“**Joint Administration Motion**”), as well as an *Expedited Motion for Authority to Enter Into a Consulting Agreement with Normandy Lane, LLC*. (“**Consulting Motion**”).

5. These Bankruptcy Cases are moving very quickly and have a lot of ongoing activity which will require numerous duplicative filings requiring emergency relief on joint administration. The sale process is moving very quickly as well, and the Trustee requires emergency relief on hiring a consultant. Finally, emergency relief is needed in regards to rejecting a lease to cut the administrative costs to the Estates as soon as possible.

6. Given that the above noted Motions are largely administrative in nature and the large number of people and entities on the creditor matrix, the Trustee respectfully submits that sufficient cause exists to schedule an emergency hearing to consider the Rejection Motion, Joint Administration Motion and Consulting Motion on **April 10, 2025 at 1:30 PM (CT)**, and setting an applicable objection deadline of **April 9, 2025 at 5:00 PM (CT)**.

7. This Motion is being served on the Office of the United States Trustee, counsel for the Debtor and all parties who have requested notice pursuant to Bankruptcy Rule 2002. The Trustee submits that such service is adequate and sufficient for purposes of the relief requested in the Rejection Motion, Joint Administration Motion and Consulting Motion, and would afford interested parties sufficient notice and opportunity to be heard. In light of the nature of the relief requested, the Trustee submits that no further notice need be given.

WHEREFORE, PREMISES CONSIDERED, Michelle H. Chow, Chapter 7 Trustee, prays that the Court enter an Order scheduling an emergency hearing on the Rejection Motion, Joint

Administration Motion and Consulting Motion on **April 10, 2025 at 1:30 PM (CT)**, and for such other and further relief as she may show herself justly entitled.

DATED: April 4, 2025

Respectfully submitted,

SINGER & LEVICK, P.C.

By: /s/ Michelle E. Shriro
Larry A. Levick
State Bar No. 12252600
Michelle E. Shriro
State Bar No. 18310900
Todd A. Hoodenpyle
State Bar No. 00798265

16200 Addison Road, Suite 140
Addison, Texas 75001
Phone: 972.380.5533
Fax: 972.380.5748
Email: levick@singerlevick.com
Email: mshriro@singerlevick.com
Email: hoodenpyle@singerlevick.com

PROPOSED GENERAL COUNSEL FOR
MICHELLE H. CHOW, CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District, which includes the parties as shown below; on this 4th day of April, 2025.

<u>DEBTOR:</u> DZS Inc. 5700 Tennyson Parkway, Suite 400 Plano, TX 75024 VIA ECF Noticing through its attorney	<u>ATTORNEY FOR DEBTOR:</u> Travis A. McRoberts Baker Botts L.L.P. 2001 Ross Avenue, Suite 900 Dallas, TX 75201-1980 VIA ECF Noticing
<u>TRUSTEE:</u> Michelle H. Chow 16200 Addison Road, Suite 140 Addison, TX 75001 VIA ECF Noticing	<u>US TRUSTEE:</u> Office of the US Trustee 110 N. College Ave., Suite 300 Tyler, Texas 75702 VIA ECF Noticing

/s/ Michelle E. Shriro
Michelle E. Shriro